Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address	FOR COURT USE ONLY
Raymond Perez, Esq. SBN# 116087	
Law Offices of Raymond Perez	
5161 Pomona Blvd., Suite 208	
Los Angeles, CA 90022	
(323) 685-8060	
(323) 685-8064 Fax	
rperezalw.ela@gmail.com	
Tperezaiw.eia@gmaii.com	
No.	
☐ Individual appearing without attorney X Attorney for: Rosita Bello	
UNITED STATES B	ANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA	A - LOS ANGELES DIVISION
In re:	CASE NO.: 2:22-bk-14943-WB
Rosita Bello	CHAPTER: 13
	NOTICE OF MOTION AND MOTION IN
	INDIVIDUAL CASE FOR ORDER IMPOSING A
	STAY OR CONTINUING THE AUTOMATIC
	STAY AS THE COURT DEEMS APPROPRIATE
	(with supporting declarations)
	DATE: 10-4-22
	TIME: 10:00 am
Debtor(s).	COURTROOM: 1375
	COOKINGOW. 7773
Movant: Rosita Bello	
	TO A POT TO A COLO CONT
1. NOTICE IS HEREBY GIVEN to DEILER & nav	nce, cre by thancial dervices
(Secured Creditor/Lessor), trustee (if any), and affected	creditors (Responding Parties), their attorneys (if any), and
other interested parties that on the above date and time	e and in the stated courtroom, Movant in the above-captioned
	or continuing the automatic stay as to certain creditors and
actions described in the motion on the grounds set forth	THE attached motion.
2. Hearing Location:	
255 East Temple Street, Los Angeles, CA 90012	411 West Fourth Street, Santa Ana, CA 92701
21041 Burbank Boulevard, Woodland Hills, CA 913	67
3420 Twelfth Street, Riverside, CA 92501	
3. X a. This motion is being heard on REGULAR NOT	ICE pursuant to LBR 9013-1. If you wish to oppose this
	motion with the court and serve a copy of it upon the Movant's
	•

			no less than 14 days before the above hearing and ap	
	b.	the hea	notion is being heard on SHORTENED NOTICE. If your earing. Any written response or evidence must be filed pefore the hearing.	
		(1) 🔀	An Application for Order Setting Hearing on Shorten calendaring procedures of the assigned judge).	ed Notice was not required (according to the
		(2)	An Application for Order Setting Hearing on Shorten granted by the court and such motion and order has creditor(s) and trustee, if any.	
		(3)	An Application for Order Setting Hearing on Shorten Once the court has ruled on that motion, you will be specify the date, time and place of the hearing on the serving a written opposition to the motion.	served with another notice or an order that will
	approv	ed court	act the Clerk's Office or use the court's website (<u>www.</u> rt form for use in preparing your response (optional co response using the format required by LBR 9004-1 and	urt form F 4001-1.RESPONSE), or you may
			e a written response to the motion or fail to appear at t right to oppose the Motion and may grant the request	
Date	e: <u>09/</u>	14/2022		
			<u>Law O</u> Printed	ffices of Raymond Perez I name of law firm (if applicable)
			Raymo	ond Perez, Esq. I name of individual Movant or attorney for Movant
				luy Puy ure of individual Movant or attorney for Movant
			Signat	ure of individual Movant or attorney for Movant

4.

MOTION FOR ORDER IMPOSING A STAY OR CONTINUING THE AUTOMATIC STAY AS THE COURT DEEMS APPROPRIATE

Mo	vant: <u>R</u>	osito Bello
1.		Movant moves for an order imposing a stay with respect to the following property (Property): Vehicle (describe year, manufacturer, type, and model): Vehicle Identification Number: Location of vehicle (if known):
		Equipment (describe manufacturer, type, and characteristics): Serial number(s): Location (if known):
		Other Personal Property (describe type, identifying information, and location): Real Property
	IC.XI	Street Address: 6128-6134 Gallant St. Apt./Suite No.: City, State, Zip Code: Bell Gardens, CA 90201 Legal description or document recording number (include county of recording):
		∑ See attached continuation page
		owing creditor(s) have a security interest or unexpired lease in this Property (give full name and address of Selene Finance, L.P. Attn: Bankruptcy Department, P.O. Box 422039, Houston, TX 77042
	Additio	re the sum of approximately \$ 813,232.00 now owed. (Secured Creditor/Lessor). nal creditors who are the subject of this motion, and their respective claims, addresses and collateral, are ed on the continuation sheets attached. (Attach additional sheets as necessary)
	b. 🔀	Movant moves for an order imposing a stay with respect to <i>any and all actions</i> against the Debtor and the estate taken concerning the debt/lease owed to the <u>Secured Creditors/Lessors</u> as described in this motion; and/or
	c. 🔀	Movant moves for an order imposing a stay as to all creditors.
	d. 🗌	Movant moves for an order continuing the automatic stay with respect to any and all actions against the Debtor and the estate taken concerning the debt/lease owed to the <u>Secured Creditor/Lessor</u> , and/or
	е. 🔲	Movant moves for an order continuing the automatic stay as to all creditors.
2.		History: A voluntary ☐ An involuntary petition concerning an individual[s] under chapter ☐ 7 ☐ 11 ☐ 12 ☒ 13 was filed concerning the present case on (specify date): 10/03/2021
	b. 🔲	An Order of Conversion to chapter
	с. 🔲	Plan was confirmed on (specify date):

u.		petition date in this case. These cases and the reasons for dismissal are:		
	1.	Case name: Rosita Bello Case number: 21-bk-17694-WB Date filed: 10/03/2021 Relief from stay re this Property Reason for dismissal: Dismissed almost a year of plan payments for failure loss of tenant.	granted	
	2.	Case name: Case number: Date filed: Relief from stay re this Property Reason for dismissal: Chapter: Date dismissed: Was was not	granted	
		See attached continuation page		
e.	\boxtimes	As of the date of this motion the Debtor has has not filed a statement of intention has not performed as promised therein.	ent of intentions regarding this ons has been filed, Debtor ⊠has	
f.	\boxtimes	The first date set for the meeting of creditors under 11 U.S.C. § 341(a) is/s has has has not fixed a later date for performance by Debtor of the ob § 521(a)(2). The extended date (<i>if applicable</i>) is	was 10/20/2022 and the court ligations described at 11 U.S.C.	
g.		In a previous case(s), as of the date of dismissal there was: an action by the Secured Creditor/Lessor under 11 U.S.C.§ 362(d) still such action had been resolved by an order terminating, conditioning or creditor.		
Th	e eq	uity in the property is calculated as follows:		
a)	1. 2. 3. 4. 5. 6. 7. 8.	Property description/value: 6128-6134 Gallant St. Creditor/Lien amount: Selene Financial Creditor/Lien amount: Creditor/Lien amount: Total Liens Debtor's Homestead Exemption Equity in the Property (subtract lines 6 and 7 from line 1 and enter here	\$ 600,000.00 \$ 813,232.00 \$ \$ \$ \$ \$ \$ \$ \$	
b)	1. 2. 3. 4. 5. 6. 7. 8.	Property description/value: 1638 Langtry Lane, L.A, CA 90077 Creditor/Lien amount: Los Angeles County Tax Collector Creditor/Lien amount: Creditor/Lien amount: Total Liens Debtor's Homestead Exemption Equity in the Property (subtract lines 6 and 7 from line 1 and enter here See attached continuation page	\$\frac{4,000.00}{\$\frac{21,852.96}{\$\frac{8}{3}}\$	

3.

4.	Gr	oun	ds fo	or Contir	nuing The Stay:
	a.	\times	Pur	suant to	11 U.S.C. § 362(c)(3) the stay should be continued on the following grounds:
		1.	\boxtimes		sent case was filed in good faith notwithstanding that a prior single or joint case filed by or against vidual Debtor which was pending within the year preceding the petition date was dismissed, e:
				в. 🔀	The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U.S.C. § 707(b); Good faith is shown because See Declaration of Brad Bello, son of Debtor, and who maintains power of attorney for Debtor in this Bankruptcy action, detailing the loss of a tenant; and now has a new tenant.
				-	
					See attached continuation page
		2.	\times	The Pro	perty is of consequential value or benefit to the estate because:
				A. 🗌	The fair market value of the Property is greater than all liens on the Property as shown above in paragraph 3 and as supported by declarations attached (describe separately as to each property);
				В. 🛚	The Property is necessary to a reorganization for the following reasons:
					The property contains 2 single family homes and 1 duplex units. Debtor resides in one single
					family home as her primary residence and the other three total units can produce rental income, so sustain Debtor;s liabilities and the Chapter 13 repayment plan.
					See attached continuation page
				c. 🗌	The Secured Creditor/Lessor's interest can be adequately protected by (describe Movant's proposal for adequate protection):
					,
					See attached continuation page
		3.	\boxtimes	The pre	esumption of a bad faith filing under 11 U.S.C. § 362(c)(3)(C)(i) is overcome in this case as to all rs because:
				A. B.	The prior dismissal was pursuant to the creation of a debt repayment plan. 11 U.S.C.§ 362(i); Debtor's failure to file or amend the petition or other documents as required by the court or Title 11 of the United States Code and resulting in dismissal was excusable because such failure was caused by the negligence of Debtor's attorney; Debtor's failure to file or amend the petition or other documents as required by the court or Title 11 of the United States Code and resulting dismissal was excusable because:
					See attached continuation page

		D. [Debtor's failure to provide adequate protection as ordered by the court in the prior case is excusable because:
			See attached continuation page
		E. 🛚	Debtor's failure to perform the terms of a confirmed plan in the prior case is excusable because: Debtor expects that income could increase by \$6,000 once the 3 units are rented at full value.
			See Declaration of Brad Bello.
			See attached continuation page
		F	There has been a substantial change in the personal or financial affairs of the Debtor since the dismissal of the prior case(s) as follows:
			From this, the court may conclude that this case, if a case under chapter 7, will result in a discharge or, if under chapter 11 or 13, in a confirmed plan that will be fully performed.
			See attached continuation page
		G. 🗌	For the following additional reasons:
		٠	
			See attached continuation page
	4. 🔀		esumption of a bad faith filing as to the Secured Creditor/Lessor under 11 U.S.C.§ 362(c)(3)(C)(ii) come in this case because
			is attempting to address all obligation in full with a feasible plan that commits available disposable with a step up that continues to commit all available rental income.
		☐ Se	e attached continuation page
5.	a. 🔲 Pu		sing a Stay: o 11 U.S.C. § 362(c)(4) this case was filed in good faith and grounds exist for imposing a stay as
	1.	The Pr Proper	operty is of consequential value or benefit to the estate because the fair market value of the ty is greater than all liens on the property as shown above in paragraph 3 and as supported by ations attached.

adequate protection): See attached continuation page b. The present case was filed in good faith notwithstanding that the prior single or joint cases fithe individual Debtor pending within the year preceding the petition date were dismissed, be 1. The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U 2. Good faith is shown because: See attached continuation page c. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this cacreditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other document the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows a see attached continuation page 2. Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor to the negligence of Debtor to the negligence of Debtor to the negligence of De	2.		The Property is of consequential value or benefit to the estate because the Property is necessary to a reorganization for the following reasons:
3. The Secured Creditor/Lessor's interest can be adequately protected by (describe Moval adequate protection): See attached continuation page b. The present case was filed in good faith notwithstanding that the prior single or joint cases fi the individual Debtor pending within the year preceding the petition date were dismissed, be 1. The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U. 2. Good faith is shown because: See attached continuation page c. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this ca creditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other document the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as followed by the court of the regligence of Debtors failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtors failure to provide adequate protection as ordered by the court in the prior case			See attached continuation page
See attached continuation page b. ☐ The present case was filed in good faith notwithstanding that the prior single or joint cases fithe individual Debtor pending within the year preceding the petition date were dismissed, be 1. ☐ The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U 2. ☐ Good faith is shown because: ☐ See attached continuation page c. ☐ The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this cacreditors because: 1. ☐ Debtor had a substantial excuse in failing to file or amend the petition or other document the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follo ☐ See attached continuation page 2. ☐ Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to provide adequate protection as ordered by the court in the prior case	3.		The Secured Creditor/Lessor's interest can be adequately protected by (describe Movant's proposal for
 b. The present case was filed in good faith notwithstanding that the prior single or joint cases if the individual Debtor pending within the year preceding the petition date were dismissed, be 1. The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U 2. Good faith is shown because:			adequate protection).
the individual Debtor pending within the year preceding the petition date were dismissed, be 1. The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U 2. Good faith is shown because: See attached continuation page C. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this cacreditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other documen the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as followed by the court of the United States Code and resulting dismissal was as the result of the negligence of Debtors. 3. Debtor's failure to provide adequate protection as ordered by the court in the prior case.			See attached continuation page
2. Good faith is shown because: See attached continuation page C. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this ca creditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other documenthe court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows: See attached continuation page 2. Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debters. 3. Debtor's failure to provide adequate protection as ordered by the court in the prior case.	b	The	e present case was filed in good faith notwithstanding that the prior single or joint cases filed by or against individual Debtor pending within the year preceding the petition date were dismissed, because:
 See attached continuation page The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this ca creditors because: Debtor had a substantial excuse in failing to file or amend the petition or other documen the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follo See attached continuation page Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to provide adequate protection as ordered by the court in the prior case 	1.		The prior dismissal was of a case not refiled under chapter 7 after dismissal under 11 U.S.C. § 707(b);
 c. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this ca creditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other documen the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows: See attached continuation page 	2.		Good faith is shown because:
 c. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this ca creditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other documen the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows: See attached continuation page 			
 c. The presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this ca creditors because: 1. Debtor had a substantial excuse in failing to file or amend the petition or other documen the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows: See attached continuation page 			
1. Debtor had a substantial excuse in failing to file or amend the petition or other document the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows: See attached continuation page Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to provide adequate protection as ordered by the court in the prior case.			See attached continuation page
the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as folloon to be attached continuation page 2. Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor's failure to provide adequate protection as ordered by the court in the prior case	с. 🔲	The cre	e presumption of a bad faith filing under 11 U.S.C.§ 362(c)(4)(D)(i) is overcome in this case as to all ditors because:
 Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor. Debtor's failure to provide adequate protection as ordered by the court in the prior case. 	1.		Debtor had a substantial excuse in failing to file or amend the petition or other documents as required by the court or Title 11 of the United States Code, resulting in the prior dismissal(s) as follows:
 Debtor's failure to file or amend the petition or other documents as required by the court United States Code and resulting dismissal was as the result of the negligence of Debtor. Debtor's failure to provide adequate protection as ordered by the court in the prior case. 			
United States Code and resulting dismissal was as the result of the negligence of Debte 3. Debtor's failure to provide adequate protection as ordered by the court in the prior case			See attached continuation page
	2.		Debtor's failure to file or amend the petition or other documents as required by the court or Title 11 of the United States Code and resulting dismissal was as the result of the negligence of Debtor's attorney;
	3.		Debtor's failure to provide adequate protection as ordered by the court in the prior case is excusable because:
See attached continuation page			See attached continuation page

	4.		Debtor's failure to perform the terms of a confirmed plan in the prior case is excusable because:
			See attached continuation page
	5.		There has been a substantial change in the personal or financial affairs of the Debtor since the dismissal of the prior case(s) as follows:
			(from which the court may conclude that this case, if a case under chapter 7, may be concluded with a discharge or, if under chapter 11 or 13, with a confirmed plan that will be fully performed).
			See attached continuation page
	6.		For the following additional reasons:
			See attached continuation page
		_	
	7.	. L	The presumption of bad faith as to the Secured Creditor/Lessor under 11 U.S.C. § 362(c)(4)(D)(ii) is overcome in this case because
			See attached continuation page(s)
6.			in Support of Motion: (Important Note: Declaration(s) in support of the Motion MUST be hereto.)
	a. 🔀		lovant submits the attached Declaration(s) on the court's approved forms (if applicable) to provide evidence
	b. Г		support of this Motion pursuant to LBRs. ther Declaration(s) are also attached in support of this Motion.
	c	N [p	lovant requests that the court consider as admissions the statements made by Debtor under penalty of erjury concerning Movant's claims and the Property set forth in Debtor's Schedules. Authenticated copies of
	d. [ne relevant portions of the Schedules are attached as Exhibit ther evidence (specify):
7.	A	n o	otional Memorandum of Points and Authorities is attached to this Motion.
			E, Movant prays that this court issue an Order Imposing a Stay and granting the following (specify ef requested):
1.	⊠ ⊤	hat '	the Automatic Stay be continued in effect as to all creditors until further order of the court.

2. 🔀	That the further	ne Automatic Stay be continued in effect as order of the court.	to the Secured Creditor/Lessor with respect to the Property until
3.		ne Automatic Stay be continued in effect as bt owed to the Secured Creditor/Lessor unt	to the Secured Creditor/Lessor with respect to actions to collect ill further order of the court.
4. [] That a	Stay be imposed as to all creditors until fur	ther order of the court.
5.	That a s	Stay be imposed as to the Secured Credito	or/Lessor with respect to the Property until further order of the
6.	That a : Secure	Stay be imposed as to the Secured Credited Creditor/Lessor until further order of the	tor/Lessor with respect to actions to collect the debt owed to the court.
7.	For ade	equate protection of the Secured Creditor/L	Lessor by (specify proposed adequate protection)
8.] For oth	ner relief requested, see attached continuat	ion page.
Date:	09/14/20	022	Respectfully submitted,
		Ī	Movant name
		•	Law Offices of Raymond Perez
		-	Firm name of attorney for Movant (if applicable)
			1
			Ren fly
		_	July pay
		5	Signature
			Raymond Perez, Esq.
			Printed name of individual Movant or Attorney for Movant
		·	The straine of manual movant of Attorney for Movant
		DECLARAT	ION OF MOVANT
		DECERNAT	ION OF MOVANT
	Raymono		, am the <u>Attorney</u>
of Mo	vant. I ha	ave read the foregoing motion consisting of	pages, and the attached materials incorporated
record	n by refere	ence. It reference is made to balances ow antikent in the ordinary course of business	ing, my testimony regarding same is based upon the business of Movant by persons whose responsibility it is to accurately
and fa	aithfully red	ecord information as to the Debtor's account uch business records.	t on or near the date of events recorded. I am one of the
I decla	are under	penalty of perjury under the laws of the Ur	nited States that the foregoing is true and correct.
00/1	4/2022	Raymond Perez, Esq.	May Du
	4/2022 ate	Printed name of declarant	Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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1	DECLARATION OF BRAD BELLO
2	I, Brad Bello, submit this declaration in support of Debtor's Motion to Impose
3	Automatic stay and declare as follows:
4	1. I have Power of Attorney over Rosita Bello, the Debtor in this matter and whom is also
5	my mother.
6 7	2. The facts stated herein are from my own personal knowledge, unless otherwise stated
8	upon information and belief, and as to such facts I believe them to be true. If called as a witness,
9	I could and would competently testify to the facts stated herein.
10	3. On 9/9/22 a chapter 13 bankruptcy filed for my Mother, Rosita Bello, number
11	22-14943-WB the present matter.
12	4. Prior to this bankruptcy, a Chapter 13 Petition with case no.: 21-17694-WB was filed
13 14	in this Court on 10/3/21 and dismissed 8/25/22 as the Chapter 13 plan could not be confirmed.
15	due to inability to meet payment obligations under the proposed plan.
16	5. Debtor has the following Real Properties in which are concern to impose a stay:
17	a. 6128-6134 Gallant Street Bell Gardens, Ca 90201. A non-judicial foreclosure is last
18	Scheduled 9/26/22.
19	b. 1638 Langtry Lane Los Angeles, Ca 90077, is a vacant lot and was under a "power
2021	to sell" by the Los Angeles County Tax Collector on 10/4/21. As of the time of this motion, it is
22	unknown when the new auction date is postponed to.
23	6. Debtor has the following properties in which Debtor can produce income, but which was
24	previously affected by COVID.
25	a. One lot known as 6128-6134 Gallant Street Bell, CA 90201, which consists of two single
26	family residences and one duplex unit.
27	

1	b. 6128 Gallant (hereafter "Unit1"); Debtor and I reside in this unit as our primary
2	residence.
3	c. 6130 Gallant Street (hereafter "Unit 2") is a single-family home that is currently vacant.
4	o. 5135 Gamait Select (netearle) Sint 2 y is a single-failing nome that is currently vacant.
5	The unit required repairs, of which were completed in March 2020. The unit is ready to be rented
6	at approximately \$2400 per month
7	d. 6132 Gallant Street (hereafter "Unit #3) is one of the duplex units. It originally
8	had a long-term tenant paying \$1500.00 with subtenants. However, the master tenant vacated the
10	premise and during COVID, the remaining subtenants are paying only \$950.00 per month due to
11	COVID guideline and restrictions. Debtor believes that rent for this unit can be restored to
12	\$2400.00.
13	e. 6134 Gallant Street (hereafter "Unit #4) is vacant currently, but listed at \$2400.00
14	monthly. There is a tenant ready to move in.
15	f. The aforementioned vacant Units currently have applicants interested in renting. We
16 17	anticipate both being rented soon.
18	7. In addition to the above rental income, Debtor also generates annual income from royalty
19	payments for a Windmill Farm on real property with APNs as follows L 427-160-10-007, 427-
20	160-13-00 and 160-13-00-6, located in Mojave, California. County of Kern.
21	8. The windmill Royalty provides an annual income of approximately \$50,000,00 payable
22	in June of each year.
23	Of this revealty payment a minimum of the control o
24	9. Of this royalty payment, a minimum of \$20,000.00 is payable to Lily Burton, who
25	holds a secured interest on the property. This secured interest resulted from a loan by Lily Burton
26	to avoid a foreclosure of the premises upon which the windmills operate.

1	10. Previously, I, Brad Bello, as an individual, am able to contribute my income in the amount
2	of \$3,500.00 to Debtor's household. This is an increase from before.
3	11. Due to the significant reduction in income and restrictions to rent out the units due to the
4	COVID pandemic, last year, the previous Ch. 13 bankruptcy proposed payments plans could be
5	met. However, Debtors believes a feasible plan can be proposed and as income is restored.
6	12. Debtor believes her income will increase significantly due to restoring rental income and
7	
8	contribution from Brad Bello. Debtor is proposing in her plan to pay \$552.00 for the first 12
9	months and then step-up to \$4152.00 for the remaining 48 months. This step up will.
10	I declare under penalty of perjury that the foregoing is true and correct. Executed this
11	14 th day of September 2022 at Los Angeles, California.
12	
13	Brad Bello
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10. Previously, I, Brad Bello, as an individual, annable to contribute my income in the amount of \$3.500.00 to Debtor's household. This is an increase from before. It. Due to the significant reduction in income and restrictions to rent out the units due to the COVID pandemic, last year, the previous Ch. 13 bankruptcy proposed payments plans could be met. However, Debtors believes a feasible plan can be proposed and as income is restored. 12. Debter believes her income will increase significantly due to testoring rental income and contribution from Brad Bello. Debtor is proposing in her plan to pay \$552.00 for the first 12 months and then step-up to \$4152.00 for the remaining 48 months. This step up will, I declare under penalty of perjury that the foregoing is true and correct. Executed this 11 14th day of September 2022 at Los Angeles, California 12 Brad Bello 13 14 15 16 17 18 19 20 21 22 23 2526 27

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 5161 Pomona Blvd., Suite 208 Los Angeles, CA 90022

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION AND MOTION IN INDIVIDUAL CASE FOR ORDER IMPOSING A STAY OR CONTINUING THE AUTOMATIC STAY AS THE COURT DEEMS APPROPRIATE (with supporting declarations)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

APPROPRIATE (with supporting declarations) will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:
TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 09/14/2022 , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the ollowing persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: Nancy K. Curry, Trustee - ecfnc@trustee13.com Sean C. Ferry - sferry@raslg.com J.S. Trustee- ustpregion16.la.ecf@usdoj.gov
Service information continued on attached page
2. <u>SERVED BY UNITED STATES MAIL</u> : On (date) <u>09/14/2022</u> , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the udge <u>will be completed</u> no later than 24 hours after the document is filed.
Hon. Julia Brand, 255 & Temple St., Suite 1382, Los Angeles, Ca. 90012
Service information continued on attached page
3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL</u> (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 4/4/22, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 4/4/22, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filled. Selene Finance LP Service One, Inc. Jba BS AHNI Bankruptey Dept Financial Services 5716 Corsa Ave #110 Westlake Village, Ca. 91362
3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL</u> (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 4/4/22, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is

Rosita Bello 6128 Gallant Street Bell Gardens, CA 90201

Chris T. Nguyen Law Office of Chris T. Nguyen, APC 16152 Beach Blvd Suite 200 Huntington Beach, CA 92647

Designed Receivable Solutions PO Box 4115 Concord, CA 94524

Franchise Tax Board Bankruptcy Section MS A340 PO Box 2952 Sacramento, CA 95812

IRS PO BOX 24017 Fresno, CA 93779-4017

Kern County Tax Collector 1115 Truxtun Ave., 2d Floor Bakersfield, CA 93301

Lily Burton 144 Reno Street Los Angeles, CA 90028

Los Angeles County Tax Collector PO Box 54110 Los Angeles, CA 90054 Case 2:22-bk-14943-WB Doc 10 Filed 09/14/22 Entered 09/14/22 16:52:00 Desc Main Document Page 16 of 16

Pinyon Pines Wind I, LLC 666 Grand Avenue, Suite 500 Des Moines, IA 50309

Selene Finance Lp Attn Bankruptcy PO Box 422039 Houston, TX 77042